

1 JASON M. FRIERSON
2 United States Attorney
3 Nevada Bar No. 7709
4 SOHAYL VAFAI, SBN CA 319266
5 Special Assistant United States Attorney
6 Office of Program Litigation, Office 7
7 Office of the General Counsel
8 Social Security Administration
9 160 Spear Street, Suite 800
10 San Francisco, California 94105
11 Telephone: (510) 970-4838
12 E-Mail: sohayl.vafai@ssa.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 JAMES CRAIG,) Case No.: 2:22-cv-01314-DJA
17 Plaintiff,)
18 vs.) **MOTION FOR EXTENSION OF TIME TO**
19 KILIO KIJAKAZI,) **FILE CERTIFIED ADMINISTRATIVE**
20 Acting Commissioner of Social Security,) **RECORD AND ANSWER**
21 Defendant.) **(FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security, by and through her undersigned attorneys, hereby moves for a 60-day extension of time to file the Certified Administrative Record (CAR) and answer to Plaintiff's Complaint. The CAR and answer to Plaintiff's Complaint are currently due to be filed by October 31, 2022. This is the Commissioner's first request for an extension of time.

Defendant submits that good cause exists for this extension request. The Office of Appellate Operations (which prepares and certifies the certified administrative record) requires additional time to prepare the CAR in this case. The undersigned apologizes for this delay. The undersigned has requested that OAO complete the CAR within 60 days of the current deadline.

Accordingly, Defendant requests an extension in which to respond to the Complaint until December 30, 2022. The undersigned attempted to confer with Plaintiff's counsel and has been unable to ascertain Plaintiff's counsel's position on this motion.

It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR and answer to Plaintiff's Complaint, through and including December 30, 2022.

Dated: October 27, 2022

JASON M. FRIERSON
United States Attorney

/s/ Sohayl Vafai

SOHAYL VAFAI
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800 San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

John B. Shook
johnshook@shookandstone.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 27, 2022

/s/ Sohayl Vafai

Special Assistant United States Attorney

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2 United States Attorney
3 Nevada Bar No. 7709
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5 Special Assistant United States Attorney
6 Office of Program Litigation, Office 7
7 Office of the General Counsel
8 Office of the General Counsel
9 Social Security Administration
10 6401 Security Boulevard
11 Baltimore, MD 21235
12 Telephone: (510) 970-4838
13 E-Mail: sohayl.vafai@ssa.gov

14 Attorneys for Defendant

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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 JAMES CRAIG,)
20 Plaintiff,) Case No.: 2:22-cv-01314-DJA
21 vs.)
22 KILIGO KIJAKAZI,) **[PROPOSED] ORDER GRANTING**
23 Acting Commissioner of Social Security) **DEFENDANT'S MOTION FOR EXTENSION**
24 Defendant.) **OF TIME**
25
26

Based upon Defendant's Motion for Extension of Time, and for good cause shown, **IT IS ORDERED** that Defendant file the Certified Administrative Record and answer to Plaintiff's Complaint by no later than December 30, 2022.

IT IS SO ORDERED:

HON. DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: October 28, 2022